

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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PROJECT VERITAS and PROJECT	:
VERITAS ACTION FUND,	: Civil Action No. 7:23-cv-04533
	:
Plaintiffs,	:
	:
-against-	:
	:
JAMES O'KEEFE, TRANSPARENCY 1,	:
LLC d/b/a O'KEEFE MEDIA GROUP,	:
ANTHONY IATROPOULOS, and RC	:
MAXWELL,	:
	:
Defendants.	:
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**AFFIDAVIT OF JAY M. WOLMAN
IN SUPPORT OF ORDER TO SHOW
CAUSE AND MOTION TO
WITHDRAW AS COUNSEL OF
RECORD**

I, Jay M. Wolman, hereby declare the following:

1. I am over 18 years of age and have never been convicted of a crime involving fraud or dishonesty.
2. I am counsel for Plaintiffs, Project Veritas, and Project Veritas Action Fund, in the above-captioned matter. I have first hand knowledge of the facts set forth herein, and if called as a witness, could and would testify competently thereto.
3. I submit this Affidavit in support of the Order to Show Cause and Motion to Withdraw as Counsel of Record (the "Motion").
4. On May 31, 2023, Movant filed the above-captioned action on behalf of Plaintiffs.
5. Since then, Movant has provided representation of Plaintiffs in this matter.
6. Plaintiffs have failed in their obligations pursuant to their representation agreement with Movant, specifically, as to Sections 3 & 6 thereof, and Section 9 of the said agreement authorizes Movant to withdraw in the event of such failure.

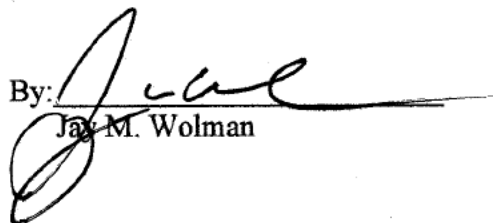
7. The present posture of the case is that discovery is under way. Both sides have served and responded to initial interrogatories and document requests, with document production in progress by both sides. Plaintiffs have served two tranches of document production and could otherwise complete production by the end of the calendar year. Three depositions have been taken by Defendants; while Defendants intend to depose others, including Project Veritas's president and a corporate representative of each Plaintiff, such is not to occur well into January 2025. Issues regarding confidentiality of a deposition and certain documents and the settlement with Defendant Maxwell are pending, with deadlines set by order of December 13, 2024, but Movant should not bear the burden of compliance.

8. Movant is not asserting a retaining lien. Movant is asserting a charging lien pursuant to N.Y. Jud. Law § 475 on all claims and causes of action brought by Plaintiffs and on any award of fees for the defense of the counterclaims.

9. To avoid prejudice to all parties, a 60 day stay and extension of all deadlines should be granted to ensure that successor counsel can be retained and properly respond to all outstanding matters.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Dec 18, 2024

By: 
Jay M. Wolman